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15 Attorneys for The Roman Catholic Archbishop of

16 San Francisco

17 UNITED STATES BANKRUPTCY COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 In re

Case No. 23-30564

20 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

Chapter 11

21 Debtor and
22 Debtor in Possession.

**NOTICE OF HEARING ON DEBTOR'S
MOTION FOR ORDER EXTENDING
EXCLUSIVITY PERIODS [11 U.S.C §
1121(d)]**

23 Date: December 14, 2023

24 Time: 1:30 p.m.

25 Location: Via ZoomGov

Judge: Hon. Dennis Montali

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27 **NOTICE IS HEREBY GIVEN** that The Roman Catholic Archbishop of San Francisco,
28 debtor and debtor-in-possession herein ("Debtor"), has filed a *Motion for Order Extending*

Case No. 23-30564

1 *Exclusivity Periods* [11 U.S.C. § 1121(d)] (the “Motion”) and that a hearing on the Motion is
2 scheduled before the Honorable Dennis Montali on December 14, 2023, at 1:30 p.m. at the United
3 States Bankruptcy Court, Northern District of California, San Francisco Division, before the
4 Honorable Dennis Montali (the “Hearing”). The Hearing will not be conducted in the presiding
5 judge’s courtroom but instead will be conducted by videoconference via ZoomGov. The
6 Bankruptcy Court’s website provides information regarding how to arrange an appearance at a video
7 or telephonic hearing. If you have questions about how to participate in a video or telephonic
8 hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on
9 the Bankruptcy Court’s website. The link to the judge’s electronic calendar is:
10 <https://www.canb.uscourts.gov/judge/montali/calendar>.

11 **NOTICE IS FURTHER GIVEN** that the Motion is supported by the *Declaration of*
12 *Joseph J. Passarello in Support of Chapter 11 Petition and Debtor’s Emergency Motions* [ECF
13 14], the *Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and Debtor’s Emergency*
14 *Motions* [ECF 15], and the additional *Declaration of Joseph Passarello in support of this Motion*
15 and the pleadings and papers on file in this case, and such other evidence and argument as may be
16 submitted before or during the hearing on the Motion.

17 By the Motion, the Debtor seeks entry of an order pursuant to 11 U.S.C. §1121(d) extending
18 the exclusivity periods within which Debtor has the exclusive right to propose a plan (which
19 currently expires on December 19, 2023) and obtain acceptance of such a plan (which currently
20 expires on February 20, 2023), until June 21, 2024 (185 days), and August 19, 2024 (181 days),
21 respectively. The Debtor believes that the relief requested is necessary and appropriate given the
22 early stage of the case, the complexity of the case, the steady progress in the postpetition
23 management of the case, and the progress toward developing a process to facilitate a plan of
24 reorganization. Further, the Court recently conducted a hearing on a separate motion by the Debtor
25 with an order pending to set the survivor claims bar date, after which the Debtor anticipates all
26 parties in interest to participate in mediation. The requested relief is without prejudice to: (a)
27 Debtor’s right to seek further extensions and the rights of parties in interest with standing to oppose
28 such requests, and (b) the rights of parties in interest with standing to seek to shorten or terminate

1 Debtor's exclusivity periods and Debtor's right to oppose such requests.

2 **NOTICE IS FURTHER GIVEN** that this notice does not contain all the particulars of the
3 Motion or supporting documents, nor does it summarize all of the evidence submitted in support.
4 For further specifics concerning the Motion and the relief requested, you are encouraged to review
5 the Motion and the supporting evidence, including the supporting Declarations, copies of which
6 may be obtained from the website to be maintained by the Debtor's proposed Claims and Noticing
7 Agent, Omni Agent Solutions, Inc., at <https://omniagentsolutions.com/RCASF>, free of charge. You
8 may also access these documents from the Court's Pacer system (requires a subscription). The web
9 page address for the United States Bankruptcy Court for the Northern District of California is
10 <http://www.canb.uscourts.gov>.

11 The Bankruptcy Court's website provides information regarding how to arrange a telephonic
12 or video appearance. Counsel, parties and other interested parties may attend the hearing in person
13 or by Zoom. Additional information is available on Judge Montali's Procedures page on the court's
14 website. Information on attending the hearing by Zoom will be provided on Judge Montali's
15 calendar posted on the court's website. The link to the judge's electronic calendar is:
16 <https://www.canb.uscourts.gov/judge/montali/calendar>.

17 **NOTICE IS FURTHER GIVEN** that any opposition or response to the Motion must be
18 in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-
19 referenced addresses so as to be received by November 30, 2023. Any opposition or response must
20 be filed and served on the Limited Service List as provided in the Interim Order Approving Motion
21 to (1) Establish Notice Procedures, (2) File Confidential Information Under Seal, and (3)
22 Temporarily Suspend Deadline for Filing Proofs of Claim at ECF 38. The updated Limited Service
23 List may be obtained from the Omni website listed above. Failure to file timely opposition and
24 appear at the hearing may constitute a waiver of your objections. Your rights may be affected. You

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1 should read these papers carefully and discuss them with your attorney, if you have one in this
2 bankruptcy case. If you do not have an attorney, you may wish to consult one.

3 Dated: November 16, 2023

FELDERSTEIN FITZGERALD WILLOUGHBY
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10 Dated: November 16, 2023

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